

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF OHIO
 WESTERN DIVISION

VIVIAN BERT, et al.,	:	Case No. C-1-02-467
	:	
Plaintiffs,	:	Judge Beckwith
	:	Magistrate Judge Hogan
vs.	:	
AK STEEL CORPORATION,	:	JOINT MOTION FOR
	:	<u>STAY OF PROCEEDINGS</u>
Defendant.	:	

The parties recently completed their exchange of expert reports. Since the final expert report was served, the Plaintiffs and Defendant have opened settlement discussions. Because of the nature and complexity of the pending action, the parties are in agreement that it will take several discussions and possibly mediation to determine whether a settlement can be achieved. Therefore, in order to avoid the accrual of potentially unnecessary legal fees and in order to allow the parties to focus exclusively on these settlement efforts, the parties request the Court to stay all further proceedings for sixty (60) days. If the Court grants this request, the parties will file a status report in thirty (30) days to keep the Court abreast of the progress of the settlement discussions.

Respectfully submitted,

s/ Gregory Parker Rogers
 Lawrence J. Barty (0016002)
 Patricia Anderson Pryor (0069545)
 Gregory Parker Rogers (0042323)
 Roger A. Weber (0001257)
 Taft, Stettinius & Hollister LLP
 425 Walnut Street, Suite 1800
 Cincinnati, Ohio 45202-3957
 (513) 381-2838
 (513) 381-0205 (fax)

 Attorney for Defendant
 AK Steel Corporation
 {W0495643.1}

s/ Robert F. Childs
 Robert F. Childs (*pro hac vice*)
 Barry V. Frederick (*pro hac vice*)
 Herman Nathaniel Johnson, Jr. (*pro hac vice*)
 Susan Gale Donahue (*pro hac vice*)
 Allison W. Lowell (*pro hac vice*)
 Wiggins, Childs, Quinn & Pantazis, LLC
 The Kress Building
 301 19th Street North
 Birmingham, Alabama 35203
 (205) 314-0500
 (205) 254-1500 (fax)

Paul Henry Tobias (OH Bar No. 0032415)
David Donald Kammer
Tobias, Kraus & Torchia
414 Walnut Street
Suite 911
Cincinnati, Ohio 45202
(513) 241-8237
(513) 241-7863 (fax)

David W. Sanford (*pro hac vice*)
Sanford, Wittels & Heisler, L.L.P.
2121 K Street, N.W.
Suite 700
Washington, D.C. 20037
(202) 942-9124
(202) 628-8189 (fax)

Attorneys for the Plaintiffs